



**ASSOCIATION OF  
METROPOLITAN  
WATER AGENCIES**

May 14, 2020

Andrew Wheeler, Administrator  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, DC 20460

**RE: PFAS Risk Communication Recommendations for EPA**

Dear Administrator Wheeler,

The Association of State Drinking Water Administrators (ASDWA) and the Association of Metropolitan Water Agencies (AMWA) are submitting this letter of recommendations to EPA on developing risk communication messages for states and water systems to use when communicating with their customers and the public about per- and polyfluoroalkyl substances (PFAS). AMWA and ASDWA are nonpartisan organizations. AMWA represents the largest publicly owned drinking water utilities and ASDWA represents the state and territorial drinking water programs.

We commend EPA for its efforts to develop PFAS risk communication tools and want to emphasize the critical need for these tools to be developed as soon as possible. ASDWA was present for the presentation by Madeline Beal, Senior Risk Communication Advisor with EPA's Office of Public Affairs, during the EPA-ECOS Bi-Monthly call on April 27th about developing content rich EPA risk communication toolkits for PFAS and other contaminants. ASDWA and AMWA are also aware that EPA's PFAS Action Plan includes an action to work "collaboratively to develop a risk communication toolbox that includes multi-media materials and messaging for federal, state, tribal, and local partners to...help ensure clear and consistent messages to the public..."

Without Federal PFAS standards, water systems need messaging for communicating risk with the public before they conduct sampling, so that when and if they find PFAS in their drinking water, they are prepared to respond immediately. Having these risk communication tools would have been extremely helpful for water systems to have in advance of conducting sampling for UCMR3 and will be very important before water systems begin sampling for the additional PFAS that will be included in UCMR5. The public needs to understand why the water system is taking samples and why they are taking actions (or not) when PFAS is found. Risk communication about these actions should include information on known versus unknown health risks from PFAS, and general characteristics – that they are bio-accumulative and highly persistent in the environment.

It is very difficult for the public to understand why some states have different (and lower level) PFAS standards and guidelines and why they require different water system response actions when PFAS are found. Some states and water systems are treating PFAS as acute contaminants and issuing "do not drink" orders for compounds found above a certain level and providing bottled water until treatment can be installed, while other states and water systems are treating PFAS as chronic contaminants and advising customers (or a subset of customers) to continue using the drinking water while the water

system works on installing treatment. EPA's development of these risk communication tools and messages should work to provide clarity on why water systems are sometimes taking different actions to address these compounds, and how to communicate their actions and the associated PFAS health risks to the public.

As EPA moves forward with this important PFAS risk communication work, ASDWA and AMWA recommend that EPA directly engage with states and water systems to develop clear and consistent risk communication messages that:

- Leverage and reference existing content from other resources including the new Interstate Technology and Regulatory Council (ITRC) document, "Risk Communication Toolkit for Environmental Issues and Concerns," that addresses PFAS, 1,4-Dioxane, and Harmful Cyanobacterial Blooms.
- Explain what is known and unknown for specific PFAS and their associated health risks, including information about what a toxicity assessment is, what a health advisory level and maximum contaminant level (MCL) is and how they differ, and the use of (or lack of) health effects studies for decision-making.
- Provide specific information and messaging for water systems to share with their customers and with the public if they find PFAS in their drinking water – for both when there is a toxicity assessment, MCL or health advisory level, and when there isn't.
- Provide some regulatory context for the public to understand why there may be different requirements and actions by different states and water systems for various PFAS.
- Explain the relative risk from drinking water compared to all PFAS exposure pathways.
- Provide clear direction for consumers to reduce their risk from PFAS in drinking water, if necessary, as well as reducing exposure via other pathways.
- Provide information about EPA's role and what the Agency is doing to assess and address PFAS in drinking water and other media, and to keep it out or remove it from the environment.

Thank you for your consideration of these recommendations. ASDWA and AMWA look forward to continuing this dialogue with EPA on the development of risk communication messaging. Please contact Alan Roberson, ASDWA's Executive Director at [aroberson@asdwa.org](mailto:aroberson@asdwa.org) or Diane VanDe Hei, AMWA's Chief Executive Officer at [vandehei@amwa.net](mailto:vandehei@amwa.net) to discuss these recommendations in more detail.

Sincerely,



J. Alan Roberson, Executive Director  
Association of State Drinking Water Administrators



Diane VanDe Hei, Chief Executive Officer  
Association of Metropolitan Water Agencies

Cc: David Ross, Assistant Administrator, Office of Water  
Jennifer McLain, Director, Office of Ground Water and Drinking Water  
Madeline Beal, Senior Risk Communication Advisor, Office of Public Affairs